

Memorandum

DATE: August 10, 2000

REPLY TO:

ATTN OF: NR-1

SUBJECT: NAVAL REACTORS DOE ORDER IMPLEMENTATION BULLETIN NUMBER 435.1-6,
REVISION 1

TO: DISTRIBUTION

DOE Order 435.1, Radioactive Waste Management, prescribes policies, guidelines, and requirements for managing high-level waste, transuranic waste, low-level waste, and the radioactive component of mixed waste at DOE facilities and for decommissioning radioactively contaminated facilities. DOE Order 435.1 supercedes DOE Order 5820.2A.

Executive Order 12344, set forth in PL 98-525 (42 USC 7158 note) and PL 106-65 (50 USC 2406), establishes the responsibilities and authorities of the Director, Naval Nuclear Propulsion Program. Accordingly, Section 3.d.(1) of DOE Order 435.1 specifically exempts Naval Reactors from the provisions of the Order. The Program's existing management policies and practices regarding radioactive waste and decommissioning radioactively contaminated facilities remain in effect.

In order to facilitate consistent interface with other DOE sites in the handling of radioactive waste, the requirements of DOE Order 435.1 are to be implemented as written with the following clarifications and exceptions:

a. Section 4.b.(1): This section requires radioactive waste to be managed in such a manner as to protect the public from exposure to radiation from radioactive materials as required in DOE Order 5400.5, Radiation Protection of the Public and the Environment. The existing environmental radiological controls requirements, policies, and practices of the Naval Reactors Program meet or exceed the intent of the requirements of DOE Order 5400.5. Unless otherwise directed by Naval Reactors, the requirements of DOE Order 5400.5 are met as indicated in Naval Reactors DOE Implementation Bulletin Number 5400.5-19.

b. Section 4.b.(2): This section requires radioactive waste to be managed in such a manner as to protect the environment as required by DOE Order 5400.1, General

Environmental Protection Program, and DOE Order 5400.5, Radiation Protection of the Public and the Environment. The requirements of DOE Order 5400.1 and DOE Order 5400.5 are satisfied as addressed in Naval Reactors DOE Order Implementation Bulletin Number 5400.1-9 and Naval Reactors DOE Implementation Bulletin Number 5400.5-19 respectively.

c. Section 4.b.(3): This section requires radioactive waste to be managed in such a manner as to protect workers in accordance with 10 CFR 835, Occupational Radiation Protection, and DOE Order 440.1A, Worker Protection Management For DOE Federal and Contractor Employees. 10 CFR 835.1.(b)(2) exempts "Activities conducted under the authority of the Director, Naval Nuclear Propulsion Program, as described in Pub. L. 98-525" from the requirements of 10 CFR 835. The requirements of DOE Order 440.1A are applicable to Program facilities only as implemented in Naval Reactors Implementation Bulletin Number 440.1A-93.

d. Section 4.c.: This section requires radioactive waste to be managed in accordance with the requirements in DOE M 435.1-1, Radioactive Waste Management Manual. The procedures and practices of the Naval Reactors Program meet or exceed the intent of DOE Order 435.1, Radioactive Waste Management, and its associated manual DOE M 435.1-1, Radioactive Waste Management Manual. Therefore, unless otherwise directed by Naval Reactors headquarters, the Naval Reactors Program shall continue to manage radioactive waste in accordance with Program documents and derived procedures already issued or approved by Naval Reactors in lieu of DOE M 435.1-1, Radioactive Waste Management Manual. DOE M 435.1-1 and its implementation guide DOE G 435.1-1 should be used as a source of information and guidance.

e. DOE M 435.1-1, Chapter I, Section 2.F.(4): This section of the Radioactive Waste Management Manual allows for the storage, treatment, or disposal of DOE radioactive waste at non-DOE facilities. Naval Reactors Program facilities are permitted to use such facilities only with prior Naval Reactors approval. Requests should be made to Naval Reactors Headquarters and only when disposal at a DOE disposal facility is not practical or cost effective.

f. DOE M 435.1-1, Chapter IV, Section N.(2): This section of the Radioactive Waste Management Manual states that "Low-level waste that has an identified path to disposal shall not be stored longer than one year prior to disposal, except for storage for decay, or as otherwise authorized by the Field

Element Manager." Prompt disposal of low-level radioactive waste with a viable disposal path is a responsible approach to low-level waste management. Naval Reactors Program facilities should continue current practices which ensure that low-level waste is dispositioned in a timely manner.

This DOE Order Implementation Bulletin supercedes Implementation Bulletin Number 5820.2A-6, Revision 0, dated March 22, 1999 and should be transmitted to the contractor for whom you are responsible and should be attached to copies of the subject Order. Should any of the requirements set forth in DOE Order 435.1 as modified by this Implementation Bulletin appear to be inconsistent with Naval Reactors requirements separately established, clarification should be obtained from Naval Reactors.


J. J. Mangeno
Naval Reactors

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Manager, PNR
Manager, SNR
Manager, IBO
Chief, WMFO